

TO: Office of the Secretary  
Federal Communications Commission  
Room 222  
1919 M Street NW, Washington, DC 20554

RECEIVED May 98

MAY 12 1998

FCC 4-11-98-11

Subject: RM-9267 Reallocation of the 420-450 MHz band (70 cm) comment

Reference: Land Mobile Communications Council (LMCC) petition for rule making of reallocation of the 70 cm band.

The 440 (70 cm) band is one of the two emergency system pillars serving the Fayetteville, North Carolina area. In the past few years this band has played a vital part in providing communications prior, during and after natural disasters that have struck our community. The loss of this band would further restrict the capability of the amateur community to provide emergency communication services/system to the community.

The 190 members of the Cape Fear Amateur Radio Society (CFARS) recommend that FCC non-concur with the RM-9267 petition for rule making. On the bases that this action would have an adverse effect on the amateurs ability to provide emergency communication to the community and cost effectiveness of reallocation. Additionally, the LMCC should immediately conduct an extensive RF spectrum impact study to find a more suitable segment of the RF spectrum for future use.

Signed Sincerely

*Stephen E. Gorman / KE1HD*

Cape Fear Amateur Radio Society Member

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**RM-9267**

Secretary, Federal Communications Commission  
1919 M Street NW  
Room 222  
Washington, DC 20554

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May 26<sup>th</sup> 1998

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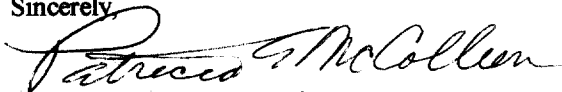
FCC MAIL ROOM

FCC MAIL ROOM

Dear Commissioners:

I am writing in regards to RM-9267 on having two-thirds of the 420-450 MHz band (70cm) reallocated to the Private Mobile Radio Service. As an Amateur Radio operator, call sign KE0XQ, I am against this happening. In our area, we use this band for Amateur Television during severe weather watches to augment the radar from the National Weather Service forecast office in Valley, NE as well as linking repeaters in the area for passing weather information that helps give the general public the earliest warning when it comes to severe weather. There is plenty of frequency spectrum out there and I ask you to consider the ramifications if the decision is made to have the Amateurs vacate these frequencies. The Amateur Radio Service is always there to lend a hand during disasters and it is a known fact that when telephone service ( land line or cellular) is knocked out, it is amateur radio that comes to the rescue.

Sincerely,



Patricia McCollum, KB0FSI  
1314 Deer Park Blvd.  
Omaha, NE 68108-2015

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May 22, 1998

Tom Walsh  
248 Rimrock Drive  
Stroudsburg, PA, 18360-8867  
Tel: (717) 620-0987

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JUN 2 1998

FCC 100-152-1

RM-9267,  
Secretary,  
Federal Communications Commission  
1919 M Street NW  
Washington, DC, 20554

Re: Comment on RM-9267

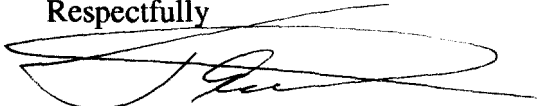
Dear Commissioners,

I am a licensed Amateur Radio Operator and am very distressed to hear of the recent proposal by the LMCC to acquire possession of major segments of the 70 cm. band. I own and operate two UHF repeaters within the 440-450 mhz segment. These repeaters are privately funded by myself and are open for use by all licensed operators. I have spent considerable time and money on erecting and maintaining these two machines. I do not see how they can co-share with us.

In the short term, the adoption of the LMCC proposal would remove these two repeaters from service to the local communities and remove an emergency communications option for Monroe County, Pennsylvania. Confinement of the existing amateur services to within the 430-440 Mhz segment would, without question, mean the loss of a major percentage of existing UHF FM repeaters. With the loss of the UHF linking frequencies our allocation within the 2 meter band would suffer a serious loss of its' effectiveness should we lose our current ability to maintain wide coverage repeater systems.

I respectfully remind the Commission of the past effectiveness of the Amateur Radio community to respond to local emergencies by providing much needed communications. The adoption of RM-9267 would only trade off more unskilled commercail users at the expense of experienced radio operators that possess a much higher degree of technical skills, many of us able to improvise or repair communications systems. I encourage you to take the broader view, it certainly is easier ( cheaper ) for the LMCC to demand more frequencies as opposed to better utilization / sharing within their services.

Respectfully



Thomas J. Walsh  
Amatuer Call: WN3L

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May 27, 1998

4181 Wash Lee Ct.  
Lilburn, GA 20047

RM-9267  
Office of the Secretary  
Federal Communications Commission  
Room 222, 1919 M Street NW  
Washington, DC 20554

RECEIVED  
JUN 2 1998  
FEDERAL COMMUNICATIONS COMMISSION

Dear Sirs;

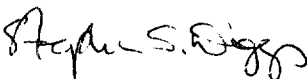
This letter is in reference to RM-9267, a proposal by the LMCC to reallocate portions of the 420-450 MHz band such that they become primary users. I am a licensed amateur radio operator (callsign W4EPI) and make daily use of this band, and would see a very negative impact on my ability to communicate in my home area.

I personally use this band for amateur TV, point-to-point digital communications, digital communications via repeater, FM voice and SSB voice. Given that our 2 meter band is quite overloaded in the Atlanta metropolitan area, the 70 centimeter provides us an excellent alternative. We have been very attentive not interfere with the U.S. military, the primary users of this band.

I have over \$5000 of radio equipment that would become unusable if amateur radio were unable to use this band to the extent that we do now.

I recommend that this proposal be declined for further consideration.

Regards,



Stephen S. Diggs, W4EPI

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14311 E. Rosecrans Ave. #3  
La Mirada, CA 90638

DOCKET FILE COPY ORIGINAL

Federal Communications Commission  
Secretary of the FCC  
Washington D. C. 20554

Reference: RM-9267

Dear Commissioners:

As a licensed Amateur Radio operator and Los Angeles County Disaster Communications Service Volunteer, I am going on record as being strongly opposed to petition RM-9267, currently under consideration.

I am active on many Amateur Radio frequencies that promote the public welfare through emergency, disaster and public service communications. The frequencies stated in RM-9267 are very important to our continued success in serving the public through our work. These frequency band segments (420 to 430 MHz and 440 to 450 MHz) include important linking, control, amateur television and repeater systems that are used daily in Southern California.

RM-9267 proposes that the land mobile service would become primary user, instead of the U.S. Government, and the Amateur Radio Service would remain secondary. I feel that this probably would not work since frequency space is limited and would then be shared by groups using similar transmission modes. This could eventually lead to claim and control of the entire spectrum by the primary user. Land mobile service has not provided any method of accountability for their individual users, who are not required to give the call sign of the station holding the license. This may well cause serious interference with amateur radio operators.

Here in Southern California, portable mobile radio service units are as readily available as Citizen Band radios. I believe that the Land Radio Service's need for additional frequencies is hastened by the proliferation and use of these units by unlicensed operators on the existing bands.

In a long relationship with the Department of Defense as the primary user, Amateur Radio has proven to be a compatible, successful and responsible secondary partner to the military radar operations on these frequency bands.

Please don't take something that seems to be working so well and "fix it".

Please deny petition RM-9267.

Respectfully,

  
Steven A. Murray

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DOCKET FILE COPY ORIGINAL

Federal Communications Commission  
Secretary of the F.C.C., Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554  
cc. RM-9267

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JUN 2 1938

FCC MAIL ROOM

Dear Sirs,

As a Amateur Radio Operator, I strongly oppose assigning the 420-430 and 440-450 MHz frequencies for Land Mobile use as outlined in Petition RM-9267. The Petition gives no technical solutions on how Amateur Radio can co-exist with the proposed Land Mobile stations, as the secondary user. Under the current system Amateur Radio has co-existed with Department of Defense as the secondary user for many years. This sharing of the bands has few problems, since the military uses the bands mainly to test radar

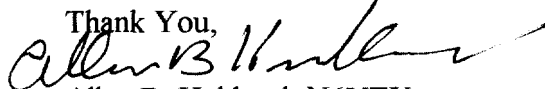
Here in California, Amateur Radio relies greatly on 420-430 and 440-450 MHz bands for voice repeaters, and repeater linking and control systems. Many of the wide area 144 MHz repeater systems in this state use the 420-430 MHz band to link the sites together. F.C.C. regulations in Part 95 require the remote control of 144 MHz repeaters to be done on higher frequencies than 144-147.95 MHz.. This control is mainly done on the 420-430 MHz band.

In Southern California alone, there are 1700 + Amateur Radio voice repeater systems. Almost 700 of these are in the 440-450 MHz band. The lost of these 700 would greatly overload the remanding voice repeater systems. With this state's problems with earthquakes, wild fires, floods and other disasters, these repeaters are used for Public Service use by providing emergency disaster communications to Police, Fire and other Public Aid providers. We use these repeaters and linking systems on a daily basis for Public Service and Safety use. We also use these systems for personal communications with friends and family.

Every year the Pasadena Tournament of Roses, Los Angeles Marathon, Baker to Vegas Law Enforcement Relay, Angeles Crest 100 Marathon Race and many other Public Events in Southern California and Southern Nevada depend on Amateur Radio to provide communications for their events. These Amateurs could not get the job done with out the 420-430 and 440-450 MHz bands

I urge the F.C.C. not to sell or give out these radio bands to a uncertain future. I feel that the Amateur Radio bands should be protected as a national public resource. Once these bands are sold off to the highest bidder or reallocated, they are gone forever to the Amateur Service.

Thank You,



Allen B. Hubbard N6VTX

3373 Villa Knolls Dr.

Pasadena, California 91107

(626) 794-4744

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DOCKET FILE COPY ORIGINAL

**RM-9267**

RECEIVED

JUN 2 1998

May 26<sup>th</sup> 1998

FCC MAIL ROOM

Secretary, Federal Communications Commission  
1919 M Street NW  
Room 222  
Washington, DC 20554

Dear Commissioners:

I am writing in regards to RM-9267 on having two-thirds of the 420-450 MHz band (70cm) reallocated to the Private Mobile Radio Service. As an Amateur Radio operator, call sign KE0XQ, I am against this happening. In our area, we use this band for Amateur Television during severe weather watches to augment the radar from the National Weather Service forecast office in Valley, NE as well as linking repeaters in the area for passing weather information that helps give the general public the earliest warning when it comes to severe weather. There is plenty of frequency spectrum out there and I ask you to consider the ramifications if the decision is made to have the Amateurs vacate these frequencies. The Amateur Radio Service is always there to lend a hand during disasters and it is a known fact that when telephone service ( land line or cellular) is knocked out, it is amateur radio that comes to the rescue.

Sincerely,

*Bill Mc Collum*

Bill McCollum, KE0XQ  
1314 Deer Park Blvd.  
Omaha, NE 68108-2015

*O+Y*

*OCT*

Gary G. Erro  
16970 Marygold Ave., Unit 61  
Fontana, Ca 92335

May 27, 1998

FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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In the matter of:

|                             |   |         |
|-----------------------------|---|---------|
| Proposed Reallocation of    | ) |         |
| 420 to 430 MHz and 440      | ) |         |
| to 450 MHz from the Federal | ) | RM 9267 |
| Government to the Private   | ) |         |
| Mobile Radio Service        | ) |         |

The Land Mobile Communications Council's (LMCC) request for immediate reallocation of these frequency segments from the federal government based upon "additional spectrum needs of the PMRS (Private Mobile Radio Service) community" is directed solely toward commercial growth and should be rejected, since:

1. The Amateur Radio Service has experienced considerable growth, with increased utilization of these frequencies for both regular and emergency communications. Many of the hand-held and mobile transceivers owned by Amateur Radio Operators include this frequency band along with 144 to 148 MHz. This constitutes a pre-existing large investment of private funds for the purchase of equipment to be used in disaster communications emergencies, and at No Cost to the Taxpayer.
2. The Radio Amateur Civil Emergency Service (RACES) -(operating under the "wing" of FEMA), the Amateur Radio Emergency Service (ARES) and virtually ALL local level Emergency Services (including hospitals and medical centers) include these frequencies as an integral part of their Emergency Communications Plans.
3. LMCC, in its push for possession of these frequencies on a Primary basis, suggests that Amateur Radio applications can remain as secondary to PMRS, but has failed to detail just how this can be accomplished without disrupting or seriously impacting the Amateur Radio Service, especially as it relates to simplex, repeater, data and DISASTER communications.
4. The Amateur Radio service has long been recognized for its role in providing unparalleled service in disasters. Everyone realizes how a disaster results in an immediate overload of commercial communications circuits. Amateur Radio Operators provide the nation with a Zero-cost emergency communications system using privately owned and

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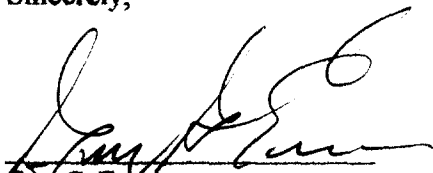


Page 2

5. Cont'd... maintained equipment, the expertise with which to use it that was also gained through private funding and drive, and a dedication to service that meets the disaster communications needs for the Nation. Police Departments, Fire Fighters, Service Organizations (SATERN and The American Red Cross) and Search and Rescue Operations are all examples of groups that rely heavily upon Amateur Radio Operators and their equipment during disasters of all types.

As President of the Kaiser Amateur Radio Association and member of the Kaiser Permanente Amateur Radio Network, and as a member of the of Victorville (Ca) RACES, the Inland Empire Amateur Radio Club and a delegate to the Inland Empire Council of Amateur Radio Organizations (IECARO), I enthusiastically, and with much animation, urge the Commission to reject this request by the LMCC.

Sincerely,



Gary G. Erbo

DOCKET FILE COPY ORIGINAL

Raymond Benny  
160 Brandt Ave  
Oak View, CA 93022

Office of the Secretary  
Federal Communications Commission  
Room 222  
1919 M Street NW  
Washington, DC 20554

28 May 1996

RECEIVED

JUN 2 1996

FCC MAIL ROOM

RE: Comments Opposing RM-9267

Dear Sir:

I am filing comments in opposition to Petition for Rulemaking RM-9267 filed by the Land Mobile Communications Council.

I am an Amateur Extra Class amateur radio operator, licensed for 38 years, my callsign is N6VR. I am an active user of amateur radio bands ranging from 160 meters through 450 MHz. For the past 10 years I have been using the 420 - 450 MHz band for backbone radio links to connect my DX PacketCluster node to the rest of the Southern California system. My node is part of 16 other nodes (So. Calif.) that provide real time data to as many as 400 amateur radio operators at a time.

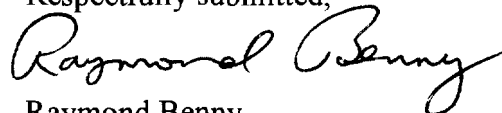
Reallocation of primary status in 420-430 MHz and/or 440-450 MHz band segments to the Private Mobile Radio Service (PMRS) would have a significant adverse affect on the amateur radio community, and on me personally. Should PMRS activity become primary user of these frequencies, I am convinced that current Amateur Radio Service activities and in particular the Southern California PacketCluster system would be significantly disrupted, and may prove entirely unable to operate as a secondary user.

My personal investment in radios and antennas for my system is over \$4000. This does not including the many hours of effort required to install and maintain this equipment.

These economic losses may seem small by some measures, but it should be remembered that all this investment have been made by individuals, and have been made for reasons that have nothing to do with profit and everything to do with public service.

I recommend that petition RM-9267 should be denied.

Respectfully submitted,

  
Raymond Benny

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

RECEIVED  
JUN 2 1998  
FCC MAIL ROOM

In the Matter of )  
 )  
An Allocation of Spectrum for )  
Private Mobile Radio Services ) RM-9267  
 )

To: The Secretary,  
Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

I am writing in opposition to the Land Mobile Communications Council's proposal to re-allocate the 420-430 MHz and 440-450 MHz frequency spectrum to commercial, private, land mobile applications. Instead, I ask that the Commission change the Amateur allocation from secondary to co-primary with the U.S. government. Prior to the Cold War era, the Amateur Radio Service was a primary status user of these frequencies. With the tremendous success of the modern "no code" Technician license and the high growth of Amateur UHF operations, now is the time to restore Amateur Radio's historic primary status within the 420-450 MHz band.

The 420-450 MHz Amateur allocation is the second most used Amateur VHF/UHF band. The LMCC has requested "sharing" this band with Amateur operations yet provides no explanation for how "sharing" might occur. Based on the history of "sharing" with commercial services (particularly the example of AVL companies "sharing" 902-928 MHz who ordered hams off the air), "sharing" means that Amateur operations will be evicted from the band. This is what happens when commercial, for profit services "share" with not-for-profit, community service oriented Amateur Radio operations.

Amateur Radio has and will continue to share its VHF/UHF allocations with *mutually compatible* services and operations. These have included, the U.S. government, the U.S. military, NOAA doppler wind shear radar and other government radiolocation services. Amateur Radio has a long and proud history of supporting the U.S. armed forces and NOAA through the National Weather Service's SkyWarn system. For these reasons, there is a *mutual interest in sharing between compatible services* like Amateur Radio and the U.S. government. However, there are *no mutual interests* in common with for-profit private land mobile

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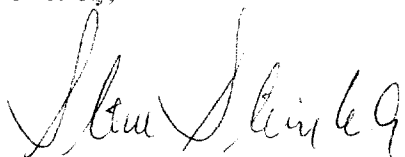
services; "sharing", as in the AVL example, will result in the loss of 420-430 and 440-450 MHz by the Amateur service, which will prove devastating to the mission of the Amateur Radio service.

Many government agencies and non-profit disaster relief organizations would be tremendously harmed by the loss of the Amateur 420-430 and 440-450 MHz allocations .

Private and for-profit radio services do not have mutually compatible interests with the Amateur Radio Service. Sharing between private land mobile and the Amateur Radio Service, as proposed by the LMCC, will not work. The 420-450 MHz band is the second most used VHF/UHF Amateur Radio allocation. The loss of these frequencies will cause severe disruption to the mission of Amateur Radio, as specified in C.F.R. Title 47 Part 97.1, and will render severe harm to the Amateur's ability to support numerous government and non-profit relief agencies.

I respectfully request that you DENY the request of the LMCC to share the Amateur radio allocations at 420-430 and 440-450 MHz. Instead, I request that the Commission restore Amateur Radio's historic co-primary status in the entire band 420-450 MHz.

Sincerely,

A handwritten signature in cursive script, appearing to read "Steve Steinberg".

Steve Steinberg AC6KG  
68740 Panorama Road  
Cathedral City, Ca. 92234

May 26, 1998

DOCKET FILE COPY ORIGINAL

Robert G. Abbott/ KF6PGJ  
20465 Shamrock Place  
Chatsworth, Calif. 91311

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JUN 2 1998

FCC MAIL ROOM

Federal Communication Commission  
Secretary, Room 222  
1919 M. Street, N.W.  
Washington, D.C. 20554

Re: RM - 9267

Dear Commission:

As a licensed Amateur Radio Operator, I would like to go on record as being strongly opposed to the petition under consideration, RM-9267.

I am active on many Amateur Radio frequencies that promote public welfare through emergency, disaster and public service communication. The frequencies stated in RM-9267 (420 MHz to 430 MHz and 440 MHz to 450 MHz), are very important to our continued success in serving the public and our communities through our work. These frequency segments also include important linking, control, and repeater systems that are used daily in our area.

One of the five reasons that our Government created the Amateur Radio Service was to have a readily available pool of trained operators to assist with emergency communications when the unexpected occurs. While Amateur Radio is allocated as the secondary user of these frequencies, our emergency networks have caused little interference to the primary user, the United States Government. RM-9267 contains no technical solutions that prove Amateur Radio operators could continue to use these bands for emergency preparations and operations if land mobile communications became the primary user. In Southern California, this relatively small portion of Spectrum will quickly fill up with bases, mobiles, and repeaters assigned to businesses, leaving amateurs and their established emergency communication networks ineffective with the inevitable increase in business traffic under RM-9267.

Please consider fully the consequences of RM-9267 and assigning primary frequency usage to Land Mobile Radio. As a member of the Amateur Radio Community, I want to continue to serve my National, State, and Local Governments by providing my equipment and services during an emergency. RM-9267 will limit the amateur radio operator's access to these frequencies and will definitely interfere with all amateur disaster preparation communication efforts.

Sincerely,

Robert Abbott

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**DOCKET FILE COPY ORIGINAL**

2421 Orange Ave  
Moraine Ohio 45439  
(937) 299-1066  
27 May 1998

Office of the Secretary,  
Federal Communications Commission,  
Room 222,  
1919 M Street NW, Washington, DC 20554.

**RE: RM-9267**

To the Honorable Commissioners:

I am writing in regards to the Land Mobile Communications Council petition (designated RM-9267) that seeks to reallocate the frequency bands 420-430 and 440-450 MHz for the use of the Private Mobile Radio Service. These bands are now heavily used by radio amateurs, operating in the Amateur Radio Service, for a variety of public service and public interest communications. The reallocation proposed by the LMCC would ravage these operations.

The personal impact of this proposal, if adopted, will be to render thousands of dollars of my radio equipment instantly unuseable. This portion of the spectrum is my primary area of operation, and loss of it would impair my ability to aid in the above-mentioned public service communications as well as my participation in the communications of a personal nature that I and my fellow amateur radio operators enjoy daily.

In addition, the loss of these frequencies would adversely affect the public service and emergency operations provided by radio amateurs. The loss of equipment and trained operators would be equivalent to millions, if not billions, of dollars worth of lost capabilities to local, state and federal government agencies. These services have been lifesaving in the past! I would suggest that you consult the National Weather Service and The Federal Emergency Management Agency as to the worth of these services. While much of our operations in these areas take place in the 144 MHz band, the threatened frequencies are used for voice and packet links that support these operations.

In closing, I strongly urge you to deny RM-9267. Thank you for your time and consideration.

Sincerely,



Rose L. Allen, KC8DOW

CC: Congressman Tony Hall  
Senator Mike Dewine  
Senator John Glenn

No. of Copies rec'd  
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# Antietam Radio Association, Inc.

Sponsor of the Maryland - DC QSO Party

Post Office Box 52

Hagerstown, Maryland 21741

May 29, 1998

Secretary  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Re: RM-9267

Dear Sir:

I am writing in opposition to the request by the Land Mobile Communications Council to be granted primary use of the 420 to 430 Mhz and 440 to 450 Mhz subbands. As amateur radio operator N3VGS, I have a sizable investment in equipment for these frequencies and am very active in fast scan amateur television. One of the fastest growing modes of communication in amateur radio is television. If we are forced to spend large sums for computers and codec systems for digitally compressed video in the remaining portion of the 70 cm band, then video communications in amateur radio will suffer if not disappear. We currently accept interference from military radar since we are secondary users of this band as well as interference from other amateurs who have encroached on television channels with digital and FM communications. The NTSC television signal is wideband amplitude modulated and causes little interference to others. However, since we operate near the noise floor, other signals in our pass band are obvious to us. Secondary operation of amateur television to land mobile users FM and digital signals would not be possible.

I am also writing on behalf of the Valley Amateur Television Society of which I am Secretary/Treasurer. We have two operational amateur television repeaters in this band with two more under construction. Typically, their cost exceeds \$ 3000 a piece not counting towers, antennas, and feed line. This equipment would be valueless if the LMCC request is granted. Our equipment and repeaters are available for any emergency need and have been used to provide video coverage of many public service events to date.

As President of the Antietam Radio Association, I voice an equal concern for the sharing/loss of 440 to 450 Mhz subband which is heavily populated with FM repeaters. Our clubs 440 repeater is available for emergency service and operates with local government sanction from one of their secure communication sites. I don't see how amateur repeaters can exist secondary to land mobile communications since LMCC users are not bound by best amateur practice and will not monitor a frequency before transmitting. In addition, most VHF/UHF repeaters are located at remote sites on mountain tops and operated through control links using the 440 to 450 Mhz subband. I feel that our repeater operation and control links operating with local government assistance could not be counted on in an emergency if the LMCC's request is granted. fcc

Thank you for your attention to my concerns about the LMCC's request for primary usage of two thirds of the 70 cm band.

Respectfully,  
Tim Keener, N3VGS

*Tim Keener*

Antietam Radio Association  
Valley Amateur Television Society

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JET

Office of the Secretary  
Federal Communications Commission  
Room 222, 1919 M Street NW  
Washington, DC 20554

RE: RM-9267  
May 23, 1998  
470 J Street  
Washougal, WA 98671

I am expressing my opposition to granting the Land Mobile Services usage of frequencies within 420 – 450 MHz. Presently assigned to Amateur Radio. The Land Mobile Communications Council (LMCC) proposal is incompatible with continued Amateur Radio use of the band. It is especially incompatible with the emergency communication mission of Amateur Radio.

The very first principal listed in Part 97, as a fundamental purpose of Amateur Radio is "Recognition and enhancement of the value of the amateur service to the public as a voluntary noncommercial communication service, particularly with respect to providing emergency communications." Over the years the Amateur Radio community has upheld that principal by;

- \* Building and dedicating repeater systems to emergency communications
- \* Obtaining personal equipment that is compatible with the repeater systems
- \* Preparing, organizing and training for disasters
- \* Entering into agreements with numerous government agencies and disaster organizations to provide primary and supplemental communications when needed

All of this has been done with the selfless donation of personal funds, time and effort.

Many of these support communications systems use repeater and link frequencies in the 420 – 450 MHz. range. The cost of replacing these systems somewhere else in the frequency spectrum is absolutely prohibitive.

I hold a position as assistant emergency coordinator for Clark County in the State of Washington. Part of the function of this position is to develop a communication plan that is functional during the time of a disaster. That will always be work in progress but at this time part of the plan depends on the use of the 420 – 450 MHz. portion of the frequency spectrum, especially at our local level. The loss of this capability will cripple our ability to respond to the needs of the community.

There are those that will say that the Amateur Radio community has several other frequency bands in the VHF and UHF range but, 420 – 450 MHz. is the second most popular of these bands and therefore has a large existing equipment base already available for emergency communications. Additionally, Emergency Operations Centers (EOC) and other emergency communication hubs have the need to operate multiple frequencies simultaneously. That creates a hostile communications environment. The easiest and least expensive way to overcome the interference issues is to employ frequency diversification.

The loss of the ability to operate between 420 – 450 MHz. will not only deny the EOC's the use of those paths but it will also deny them use of the simplex talk around frequencies.

I urge you not to grant the Land Mobile Service access to 420 – 450 MHz and deny us the use of this important emergency management resource.

Sincerely, Robert W. Goodale, K7YFJ

*Robert W. Goodale*

No. of Copies rec'd 5  
List A B C D E 021



Date 1998 May 27

DOCKET FILE COPY ORIGINAL

From R. W. Javins  
Box 2833  
Yakima, Washington 98907

To The Secretary  
The Federal Communications Commission  
Washington, D. C. 20554

Subject RM-9267

1. As an active member of the King County Search And Rescue Association, in the Amatuer Radio Emergency Services, Ski Patrol Rescue Team, and Explorer Search And Rescue, I ask that this proposed Rule Making Number 9267 NOT be implemented.

2. The amatuer radio community is already using this spectrum to provide cost-effective services to the citizens and to Public Service Agencies such as the King County Sheriff's Office through the search and rescue community. While most of the radios carried by volunteers are Two Meter radios, the linking systems which tie together the repeaters which make up our repeater systems mainly are in the 70 cm Amatuer Radio Band.

3. As recently as this date, 1998 May 27, Wednesday, the linking system on 70 cm between our Sobieski and Rattlesnake repeater sites was used to successfully conclude a search for three teenage boys NE of Stevens Pass on US Highway 2 in an avalanche prone area. We were able to co-ordinate support activities, arrange for other personnel, and provide information to the search base over this link. The three boys and their dog were found in good condition.

4. In the year 1997, King County Search And Rescue recorded 89 missions; 41 were search and rescue. The others were ELT searches, recovery efforts, and others. Almost all of this was done by the volunteers utilizing amatuer radio. This came to 6,355 man-hours provided by trained volunteers at no monetary cost to the citizens.

5. There is value received by the citizens and governments of this country from providing this spectrum to the community of amatuer radio operators.

Thank you,

  
R. W. Javins, N7KGA

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Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, DC 20554

In the Matter of

**An Allocation of Spectrum for  
Private Mobile Radio Services**

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)  
) RM-9267

**DOCKET FILE COPY ORIGINAL**

The Secretary,  
Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

I am writing in opposition to the Land Mobile Communications Council (LMCC) proposal to re-allocate the 420-430 MHz and 440-450 MHz frequency spectrum to commercial, private, land mobile applications. Currently, these frequencies are allocated to the Amateur Radio Service on a secondary use basis. This 70cm band is the second most popular single band (after 2 meters) within the Amateur Service for use in providing emergency and public service communications. Radio Amateurs nationwide—including my own station—are utilizing this band for Amateur Television, voice repeaters, packet radio and control links. The re-allocation sought by the LMCC would be inconsistent with the mission of Amateur Radio and not be in the best interest of the public.

The LMCC has failed to demonstrate how sharing with the Amateur Service would be accomplished and it is not reasonable to expect that users within the Amateur Service would not interfere with users within the Land Mobile Service and vice-versa if both users were sharing the same frequencies. The effect of sharing would be that any secondary use would be rendered virtually impossible in urban areas and any other area where the services were within Line-Of-Site of each other.

I respectfully request the Commission deny the request in all respects.

Very truly yours,



Jeff Ryan  
Amateur Radio Station NØWPA  
6721 Northface LN  
Colorado Springs, CO 80919

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JUN 2 1998

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In The Matter Of RM-9267  
The Petition By the Land Mobile Communications Council  
For the Immediate Reallocation of 420 to 430 MHz. and 440 to 450 MHz.  
From the Federal Government to Private Mobile Radio Service.

There is not much more that the Commission can do to begin the destruction of amateur radio as it presently exists. The reallocation of the 70CM amateur band will create a void in the Amateur Service that may never be filled. More that 50 % of the Amateur Community presently operates on the VHF/UHF amateur bands. Virtually hundreds of repeaters across the country populate the 440 to 450 segment of the band with various Links and Control circuits residing on the 430 to 440 segment. These repeaters are used for every activity that can be imagined from Public Service to Rag Chewing.

In the area of public service, I point to the work done by Amateurs on the 440 to 450 segment in the Great State Maine where Ice storms took out most of the commercial communication. Much of the emergency communications during that period was handled by the Amateur community through repeaters and their associated links and control circuits.

I am sure that there is no need to remind the Commission of the good work done by the Amateur community in times of disaster. However I am compelled to remind the commission that none of this work could have been done without the use of the Repeater system, Packet System, and Satellite Systems which reside in the Band segments which you are presently considering for reallocation.

Reallocation would force all those amateurs which use the 70 CM band for rag chowing and other social gatherings to move to other frequencies. This would, without a doubt, cause over crowding on all the remaining VHF and UHF bands. Reallocation of these frequencies to commercial interest would upset the amateur emergency communications systems which are already in place. This is not in the Public Interest and reallocation should not receive any further consideration.

Respectfully submitted: Giulio Ruocco, Sr. W2XV  
1151 Mile Square Road  
Yonkers, Ny 10704

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Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of )  
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An Allocation of Spectrum for )  
Private Mobile Radio Services ) RM-9267  
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To: The Secretary,  
Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

I am writing in opposition to the Land Mobile Communications Council's proposal to re-allocate the 420-430 MHz and 440-450 MHz frequency spectrum to commercial, private, land mobile applications. Instead, I ask that the Commission change the Amateur allocation from secondary to co-primary with the U.S. government. Prior to the Cold War era, the Amateur Radio Service was a primary status user of these frequencies. With the tremendous success of the modern "no code" Technician license and the high growth of Amateur UHF operations, now is the time to restore Amateur Radio's historic primary status within the 420-450 MHz band.

The 420-450 MHz Amateur allocation is the second most used Amateur VHF/UHF band. The LMCC has requested "sharing" this band with Amateur operations yet provides no explanation for how "sharing" might occur. Based on the history of "sharing" with commercial services (particularly the example of AVL companies "sharing" 902-928 MHz who ordered hams off the air), "sharing" means that Amateur operations will be evicted from the band. This is what happens when commercial, for profit services "share" with not-for-profit, community service oriented Amateur Radio operations.

Amateur Radio has and will continue to share its VHF/UHF allocations with *mutually compatible* services and operations. These have included, the U.S. government, the U.S. military, NOAA doppler wind shear radar and other government radiolocation services. Amateur Radio has a long and proud history of supporting the U.S. armed forces and NOAA through the National Weather Service's SkyWarn system. For these reasons, there is a *mutual interest in sharing between compatible services* like Amateur Radio and the U.S. government. However, there are *no mutual interests* in common with for-profit private land mobile

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services; "sharing", as in the AVL example, will result in the loss of 420-430 and 440-450 MHz by the Amateur service, which will prove devastating to the mission of the Amateur Radio service.

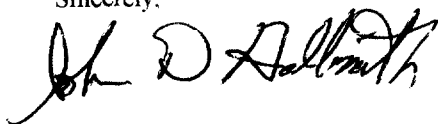
Many government agencies and non-profit disaster relief organizations would be tremendously harmed by the loss of the Amateur 420-430 and 440-450 MHz allocations. The following is a partial list of agencies that I have assisted with providing emergency communications via Amateur Radio using the 420-450 MHz band:

- American Red Cross
- Georgia Baptist Disaster Relief

Private and for-profit radio services do not have mutually compatible interests with the Amateur Radio Service. Sharing between private land mobile and the Amateur Radio Service, as proposed by the LMCC, will not work. The 420-450 MHz band is the second most used VHF/UHF Amateur Radio allocation. The loss of these frequencies will cause severe disruption to the mission of Amateur Radio, as specified in C.F.R. Title 47 Part 97.1, and will render severe harm to the Amateur's ability to support numerous government and non-profit relief agencies.

I respectfully request that you DENY the request of the LMCC to share the Amateur radio allocations at 420-430 and 440-450 MHz. Instead, I request that the Commission restore Amateur Radio's historic co-primary status in the entire band 420-450 MHz.

Sincerely,

A handwritten signature in black ink, appearing to read "John Galbraith", written in a cursive style.

John Galbraith KF4DVM  
62 Old Farm Rd  
Marietta, GA 30068

May 17, 1998

ORIGINAL

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JUN 2 1998

FCC MAIL ROOM

Thursday, May 28, 1998

IAN F SILVER  
3810 N CHERRY LN  
KANSAS CITY MO 64116-2728

Office of the Secretary  
Federal Communications Commission Room 222  
1919 M Street NW  
Washington DC 20554

REF: RM-9267

It is my understanding that the Land Mobile Communications Council (LMCC) has filed a petition for rulemaking with the Federal Communications Commission (FCC) to re-allocate 420 to 430 MHz, and 440 to 450 MHz to the Private Mobile Radio Service, allowing Amateur Radio communications on those bands on a secondary and non-interfering basis.

I am a Canadian Amateur Radio operator, living and working in the United States on a work visa. I have been licensed since 1992 by "Industry Canada". I wish to make known my objections to the proposed re-allocation of the aforementioned frequencies for several reasons:

1. Amateur operators already heavily use the spectrum in question. It is my assertion that it should be the burden of the LMCC to prove that they can serve the public good better than the existing, entrenched Amateur Radio Service, which currently occupies the 420 to 450 MHz band. Providing private communications on a fee for service basis does not constitute better public service. It only somewhat serves the interests of those using the service, but is more intended to serve the financial interests of the members of the LMCC.
  - a. Amateur Radio operators serve the public good by providing emergency communications in time of disaster, at no cost to the people they serve. The corporate communication companies can not claim this service to the public.
  - b. Amateur Radio operators always seem to manage to successfully provide communications quickly and efficiently in time of disaster, no matter how bad the situation is. The corporate communication companies, though they can invest substantial manpower and funds to repair a damaged network, can not rebuild quickly enough to serve the immediate public need, and thus the public good.

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- c. Amateur Radio Emergency communications is critical in this area of the world (The U.S. Midwest). Severe weather watches and warnings are common in the Midwest. The National Weather Service works closely with emergency operations groups and weather spotters (many of which are Amateur Radio operators) in our area. The proposed re-allocation of bandwidth will have a negative effect on our local area's ability to respond to hazardous and/or dangerous situations.
- 2. Re-allocation of the 420 to 430 MHz and 440 to 450 MHz bands places an undeserved hardship on Amateur Radio operators using the band.
    - a. Amateur Radio operators, unlike their commercial counterparts, do not generally have the funds available to allow speedy and painless change to new frequencies. In many cases, Amateur Radio operators have had to work for years to be able to experiment with a band of their choice. Since Amateur Radio operators may not charge for communications services they use and/or provide, they have no way to recoup the financial investment already made in equipment to use a band, should that band be re-allocated.
    - b. Amateur Radio operators and frequency coordinators will be forced to do a substantial amount of work to change frequencies and equipment for existing repeaters, transceivers, and other equipment away from the proposed re-allocation bands. This work would not otherwise be necessary if it were not for the proposed re-allocation.
    - c. Amateur Radio operators have no method for restitution for financial damages from the LMCC should the proposal go through. It is understood that no-one actually "owns" frequencies, but this feels much like government annexation without proper compensation, or perhaps a better term would be "Unreasonable Seizure".
  - 3. Secondary Operation with a non-interference expectation will not work to the benefit of Amateur Radio operators, and may place an extra burden on the FCC.
    - a. Non-interference with the proposed primary users of the band (LMCC) will result in demands placed on the FCC to investigate, and issue "Cease and Desist" orders to existing Amateur Radio operators trying to coexist peacefully with the Commercial radio interests.

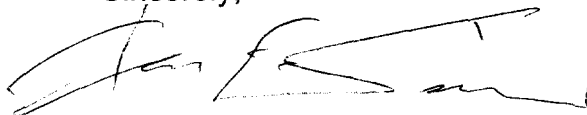
I have no doubt that this would effectively eliminate Amateur Radio operations from the 420 to 430 and 440 to 450 MHz bands, giving further

impetus for the LMCC to then apply to have Amateur Radio operations officially removed from those frequencies. The wording of the proposal does not indicate a sincere desire to work with Amateur Radio operators, but rather against them.

- b. High power operations from commercial users would effectively swamp, and possibly damage Amateur Radio operators' equipment in the affected bands. I refer you again to point 2a regarding restricted funds available to Amateur Radio operators.
4. Commercial radio interests have the funds necessary to better use their existing assigned spectrum.
- a. The existing commercial radio interests represented by the LMCC have more funds available to devote to research and development of new methods to better utilize existing spectrum. Amateur Radio operators have extremely limited resources.
  - b. Research and development of new methods to better utilize spectrum allows Commercial interests to better serve the public good by contributing to the technological advancements of the industry, and the national interests of the United States.
  - c. Re-allocation of the 420 to 430 MHz and 440 to 450 MHz bands is only a short-term solution. Commercial radio interests should rather be looking towards long term solutions. Once they run out of bandwidth to attempt annexation of, they'll need to look towards the concept of research, development, and long term solutions anyway.
  - d. Be skeptical of any organization that wants a "quick fix". Quick fixes usually only treat the symptom, not the problem. In my experience, companies that keep utilizing quick fixes, often go quickly bankrupt, leaving a horrible mess in their wake for everyone else to clean up.

I strongly urge you to deny the request in petition RM-9267, and allow the Amateur Radio Service and its operators to continue unhindered in the 420 to 450 MHz frequency range.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ian F. Silver', with a stylized flourish at the end.

Ian F. Silver (VA3DOA)



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FCC MAIL ROOM

ART MC BRIDE, KC6UQH  
705 BOZANICH CIRCLE  
VISTA, CA. 92084  
760-758-6062

MAY 15, 1998

Office of the Secretary,  
Federal Communications Commission  
Room 222  
1919 M Street NW  
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Comments on File Number RM-9267

I am an active Amateur Radio Operator on the 420-450 MHz (70 cm) band. I own two transceivers, a home built ATV Station, several amplifiers, filters, and test equipment, for the 70 cm. band. This proposal would wipe out over 1000 manhours of my effort in assembling station equipment for this band.

In Southern California, the 70 cm band is our most popular UHF band. All of the 440-450 MHz Repeater and Remote Base pairs have been coordinated by SCRUBBA for several years. The balance of the band is used for Packet, Satellite, ATV, EME, Weak signal work, and many links between Repeaters on other bands.

Compressing all of these activities into a 10 MHz portion of the band will not be possible. The most popular Two Meter transceivers today include the 440-450 MHz as a second band. All of these units would need conversion to 430-440 Mhz. Links, many Repeaters, ATV, EME, and Weak Signal work would no longer be allowed on this band. Satellite and Repeater activity would most likely consume all of the remaining 10 MHz of the band.

The Economic hardship placed on the Amateur Radio Community to replace or modify equipment made obsolete by this proposal would be staggering. Most of the linking activity would be moved to the 23 cm band, but the possibility that this band will also be compressed by a proposal for Civilian GPS may preclude moving link systems to 23 cm.

Suggesting an additional assignments in another band to replace the spectrum to be taken away by this proposal does not address the cost of conversion and will not provide sufficient spectrum for ATV work as the proposed assignments are divided into 5 MHz sections. Commercial Amateur equipment manufacturers need markets in at least two regions to justify the design costs for equipment on a new Amateur band. Adopting a new band for 2 or 3 regions requires international agreement, and many years of effort. Home construction of equipment for the proposed assignments will be limited by the few used parts and the cost of new power devices that are available for this band. The 70 cm band by contrast offers a large variety of surplus parts from Military and Civilian equipment that operate on or near the 70 cm band and can be easily converted to Amateur use.

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